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ACB-20, 578

May 27, 2020

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Hon. Edward Kiel, U.S.M.J.

United States District Court of New Jersey

Frank R. Lautenberg U.S. Post Office & Courthouse Building

2 Federal Square

Newark, New Jersey 07102

**Re: Terranova v. Borough of Hasbrouck Heights, et als
USDC Docket No.: 2:19-cv-12515-KM-ESK
Discovery Status Report**

Dear Judge Keil:

By way of reintroduction, my name is Al Buglione and I represent Officer Harold Van Winkle, with regard to the above-captioned matter.

Pursuant to Your Honor's directive of May 22, 2020 - I hereby provide this Discovery Summary/update, as follows:

- 1) The parties have exchanged Disclosures and Requests for Discovery (Interrogatories and Notices to Produce);
- 2) No Discovery has been exchanged amongst the parties, pending a settlement conference with the Court. That conference is scheduled to occur on May 28, 2020 at 4:00PM; and

3) If this matter is not resolved at the Court's forthcoming Settlement Conference, it is respectfully submitted that a new Fact Discovery Schedule would be set by the Court - at the initial Case Management Order has Fact Discovery concluding on May 29, 2020.

This concludes the submission of the parties regarding discovery, and kindly note that this update was circulated amongst all of the attorneys in this matter. As of now, I have not received any objections.

In the interim, please note that the parties stand further ready and available to expound upon the information and positions stated herein.

Lastly, please note that I cannot participate in tomorrow's Settlement Conference because I must participate in a pre-scheduled and important Public School board meeting. However, another attorney from my office will appear for me.

Respectfully submitted,

Buglione, Hutton & DeYoe, LLC

By: /s/ Albert C. Buglione
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ACB:dw